

EXHIBIT J-3

LG's Proposed Verdict Form (Single Trial)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CORE WIRELESS LICENSING)	
S.A.R.L.,)	
)	
Plaintiff,)	
)	Civil Action No. 2:14-cv-911 (lead case)
v.)	Civil Action No. 2:14-cv-912 (consolidated)
)	
LG ELECTRONICS, INC., and LG)	JURY TRIAL DEMANDED
ELECTRONICS MOBILECOMM)	
U.S.A., INC.)	
)	
Defendants.)	
)	

**LG ELECTRONICS, INC. AND LG ELECTRONICS MOBILECOMM U.S.A., INC.’S
PROPOSED VERDICT FORM**

In answering these questions, you are to follow all of the instructions I have given you in the Court’s Final Instructions to the Jury. Your answers to each question must be unanimous.

As used herein, “Core Wireless” means Core Wireless Licensing S.a.r.l. and “LG” means “LG Electronics, Inc.” and “LG Electronics Mobilecomm U.S.A., Inc.” As used herein, “’020 Patent” means U.S. Patent No. 8,434,020; “’476 Patent” means U.S. Patent No. 8,713,476; “’671 Patent” means U.S. Patent No. 8,498,671; “’667 Patent” means U.S. Patent No. 7,072,667; “’823 Patent” means U.S. Patent No. 5,907,823; “’321 Patent” means U.S. Patent No. 6,266,321; “’151 Patent” means U.S. Patent No. 6,477,151; “’536 Patent” means U.S. Patent No. 6,633,536; “’143 Patent” means U.S. Patent No. 6,978,143; “’850 Patent” means U.S. Patent No. 7,804,850; “’049 Patent” means U.S. Patent No. 8,165,049; “’398 Patent” means U.S. Patent No. 8,792,398; “’634 Patent” means U.S. Patent No. 5,946,634; “’022 Patent” means U.S. Patent No. 7,383,022; “’271 Patent” means U.S. Patent No. 7,529,271; “’664 Patent” means U.S. Patent No. 7,599,664; “’818 Patent” means U.S. Patent No. 7,782,818; and “’828 Patent” means U.S. Patent No. RE44,828.

QUESTION 1:

Did Core Wireless prove by a preponderance of the evidence that LG infringes the following claims of the following patents?

Answer “Yes” or “No” for each Claim.

'020 Patent

Claim 1 _____

Claim 2 _____

Claim 8 _____

Claim 11 _____

Claim 13 _____

'476 Patent

Claim 1 _____

Claim 8 _____

Claim 9 _____

Claim 20 _____

Claim 29 _____

'671 Patent

Claim 1 _____

Claim 4 _____

Claim 5 _____

Claim 8 _____

Claim 11 _____

'667 Patent

Claim 12 _____

Claim 13 _____

'823 Patent

Claim 1 _____

Claim 2 _____

Claim 3 _____

Claim 20 _____

'321 Patent

Claim 8 _____

Claim 10 _____

Claim 14 _____

'151 Patent

Claim 14 _____

'536 Patent

Claim 1 _____

Claim 17 _____

Claim 19 _____

'143 Patent

Claim 17 _____

Claim 18 _____

'850 Patent

Claim 21 _____

'049 Patent

Claim 11 _____

Claim 14 _____

Claim 15 _____

'398 Patent

Claim 10 _____

'634 Patent

Claim 1 _____

Claim 4 _____

Claim 23 _____

'022 Patent

Claim 7 _____

'664 Patent

Claim 14 _____

Claim 16 _____

Claim 17 _____

'271 Patent

Claim 20 _____

'818 Patent

Claim 31 _____

Claim 34 _____

Claim 43 _____

'828 Patent

Claim 20 _____

ANSWER QUESTIONS 2 THROUGH 23 ONLY AS TO THOSE CLAIMS YOU ANSWERED "YES" FOR QUESTION 1 ABOVE – OTHERWISE STOP AND DO NOT ANSWER ANY FURTHER QUESTIONS.

QUESTION 2:

Did LG prove by clear and convincing evidence that any of the asserted claims of the following patents are invalid?

If you find the claims invalid, answer "Yes," otherwise, answer "No."

'020 Patent

Claim 1 _____

Claim 2 _____

Claim 8 _____

Claim 11 _____

Claim 13 _____

'476 Patent

Claim 1 _____

Claim 8 _____

Claim 9 _____

Claim 20 _____

Claim 29 _____

'671 Patent

Claim 1 _____

Claim 4 _____

Claim 5 _____

Claim 8 _____

Claim 11 _____

'667 Patent

Claim 12 _____

Claim 13 _____

'823 Patent

Claim 1 _____

Claim 2 _____

Claim 3 _____

Claim 20 _____

'321 Patent

Claim 8 _____

Claim 10 _____

Claim 14 _____

'151 Patent

Claim 14 _____

'536 Patent

Claim 1 _____

Claim 17 _____

Claim 19 _____

'143 Patent

Claim 17 _____

Claim 18 _____

'850 Patent

Claim 21 _____

'049 Patent

Claim 11 _____

Claim 14 _____

Claim 15 _____

'398 Patent

Claim 10 _____

'634 Patent

Claim 1 _____

Claim 4 _____

Claim 23 _____

'022 Patent

Claim 7 _____

'664 Patent

Claim 14 _____

Claim 16 _____

Claim 17 _____

'271 Patent

Claim 20 _____

'818 Patent

Claim 31 _____

Claim 34 _____

Claim 43 _____

'828 Patent

Claim 20 _____

QUESTION 3:

Did LG prove by clear and convincing evidence that the claims of the '667 are unenforceable due to inequitable conduct?

Answer "Yes" or "No" _____.

ANSWER QUESTION 4 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '020 PATENT TO BE INFRINGED **AND** NOT INVALID.

QUESTION 4:

When did Core Wireless provide Notice to LG of its infringement of the '020 Patent?

ANSWER QUESTION 5 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '476 PATENT TO BE INFRINGED **AND** NOT INVALID.

QUESTION 5:

When did Core Wireless provide Notice to LG of its infringement of the '476 Patent?

ANSWER QUESTION 6 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '671 PATENT TO BE INFRINGED **AND** NOT INVALID.

QUESTION 6:

When did Core Wireless provide Notice to LG of its infringement of the '671 Patent?

ANSWER QUESTION 7 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '667 PATENT TO BE INFRINGED, NOT INVALID **AND** NOT UNENFORCEABLE.

QUESTION 7:

When did Core Wireless provide Notice to LG of its infringement of the '667 Patent?

ANSWER QUESTION 8 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '823 PATENT TO BE INFRINGED **AND** NOT INVALID.

QUESTION 8:

When did Core Wireless provide Notice to LG of its infringement of the '823 Patent?

ANSWER QUESTION 9 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '020 and '476 PATENTS TO BE INFRINGED **AND** NOT INVALID.

QUESTION 9:

What sum of money, if paid now, do you find from a preponderance of the evidence would comprise a reasonable royalty for infringement of the '020/476 patents?

\$ _____

ANSWER QUESTION 10 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '671 PATENT TO BE INFRINGED **AND** NOT INVALID.

QUESTION 10:

What sum of money, if paid now, do you find from a preponderance of the evidence would comprise a reasonable royalty for infringement of the '671 patent?

\$ _____

ANSWER QUESTION 11 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '667 PATENT TO BE INFRINGED, NOT INVALID **AND** NOT UNENFORCEABLE.

QUESTION 11:

What sum of money, if paid now, do you find from a preponderance of the evidence would comprise a reasonable royalty for infringement of the '667 patent?

\$ _____

ANSWER QUESTION 12 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '823 PATENT TO BE INFRINGED **AND** NOT INVALID.

QUESTION 12:

What sum of money, if paid now, do you find from a preponderance of the evidence would comprise a reasonable royalty for infringement of the '823 patent?

\$ _____

ANSWER QUESTION 13 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE
ASSERTED CLAIMS OF THE '321 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 13:

What sum of money, if paid now in case, do you find from a preponderance of the
evidence would fairly and reasonably compensate Core Wireless for infringement of the '321
patent?

\$ _____

ANSWER QUESTION 14 ONLY IF YOU HAVE FOUND THE ASSERTED CLAIM OF THE
'151 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 14:

What sum of money, if paid now in case, do you find from a preponderance of the
evidence would fairly and reasonably compensate Core Wireless for infringement of the '151
patent?

\$ _____

ANSWER QUESTION 15 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE
ASSERTED CLAIMS OF THE '536 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 15:

What sum of money, if paid now in case, do you find from a preponderance of the
evidence would fairly and reasonably compensate Core Wireless for infringement of the '536
patent?

\$ _____

ANSWER QUESTION 16 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '143 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 16:

What sum of money, if paid now in case, do you find from a preponderance of the evidence would fairly and reasonably compensate Core Wireless for infringement of the '143 patent?

\$ _____

ANSWER QUESTION 17 ONLY IF YOU HAVE FOUND THE ASSERTED CLAIM OF THE '850 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 17:

What sum of money, if paid now in case, do you find from a preponderance of the evidence would fairly and reasonably compensate Core Wireless for infringement of the '850 patent?

\$ _____

ANSWER QUESTION 18 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '049 PATENT OR THE '398 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 18:

What sum of money, if paid now in case, do you find from a preponderance of the evidence would fairly and reasonably compensate Core Wireless for infringement of the '049/'398 patents?

\$ _____

ANSWER QUESTION 19 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '634 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 19:

What sum of money, if paid now in case, do you find from a preponderance of the evidence would fairly and reasonably compensate Core Wireless for infringement of the '634 patent?

\$ _____

ANSWER QUESTION 20 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '022 PATENT OR THE '664 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 20:

What sum of money, if paid now in case, do you find from a preponderance of the evidence would fairly and reasonably compensate Core Wireless for infringement of the '022/'664 patents?

\$ _____

ANSWER QUESTION 21 ONLY IF YOU HAVE FOUND THE ASSERTED CLAIM OF THE '271 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 21:

What sum of money, if paid now in case, do you find from a preponderance of the evidence would fairly and reasonably compensate Core Wireless for infringement of the '271 patent?

\$ _____

ANSWER QUESTION 22 ONLY IF YOU HAVE FOUND ONE OR MORE OF THE ASSERTED CLAIMS OF THE '818 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 22:

What sum of money, if paid now in case, do you find from a preponderance of the evidence would fairly and reasonably compensate Core Wireless for infringement of the '818 patent?

\$ _____

ANSWER QUESTION 23 ONLY IF YOU HAVE FOUND THE ASSERTED CLAIM OF THE '828 PATENT TO BE INFRINGED AND NOT INVALID.

QUESTION 23:

What sum of money, if paid now in case, do you find from a preponderance of the evidence would fairly and reasonably compensate Core Wireless for infringement of the '828 patent?

\$ _____

ANSWER QUESTION 24 ONLY IF YOU ANSWERED AT LEAST ONE OF QUESTIONS 4 THROUGH 23.

QUESTION 24:

Are the amounts of money you found in Questions 3 through 13 one-time lump sums for past and future sales, or royalties for past sales only?

Check one of the following:

One-time lump sums _____

-OR-

Royalties for past sales _____

ANSWER QUESTIONS 25 AND 26 ONLY IF YOU FOUND AT LEAST ONE CLAIM INFRINGED AND NOT INVALID.

QUESTION 25:

Did LG prove by a preponderance of the evidence that the sales of chipsets by Qualcomm were authorized under a license?

Check one of the following:

Yes _____

-OR-

No _____

QUESTION 26:

Did LG prove by a preponderance of the evidence that Core Wireless is barred by patent exhaustion from enforcing the asserted patents that Core Wireless asserts are standard essential?

Check one of the following:

Yes _____

-OR-

No _____